

**IN THE U.S. DISTRICT COURT FOR MARYLAND,  
SOUTHERN DIVISION**

**BEYOND SYSTEMS, INC.**

Plaintiff

v.

**WORLD AVENUE USA, LLC, ET AL.**

Defendants

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**Case No. PJM 08 cv 0921**

**PLAINTIFF’S MOTION FOR EXTENSION OF TIME**  
**WITH PARTIAL CONSENT OF DEFENDANTS**

Plaintiff, Beyond Systems, Inc., through counsel, moves for an extension of time for production of documents responsive to the Court’s rulings at the hearing on September 23, 2010, largely due to the deposition schedule in this case, and states as follows:

1. At the hearing and in orders issued thereafter the Court required both sides to make certain supplemental production of documents.
2. Plaintiff produced the “embedded images” as required within 48 hours of the hearing as directed by the Court.
3. Plaintiff has made ongoing installments of supplemental production during discovery, including some within the past month.
4. Plaintiff has assembled most of the copies of subpoenas that the Court directed Plaintiff to produce within one week of the hearing, but has not yet made the supplemental production of those items directed by the Court to be made within one week of the hearing.
5. Plaintiff has begun the process of reviewing documents for further supplemental production as directed by the Court but has not completed that process or the supplemental production.

6. Counsel for both sides have been in Fort Lauderdale, Florida for depositions of non-parties by Plaintiff on September 29 and 30, 2010. Another deposition of a non-party has been scheduled by Defendant World Avenue USA, LLC for October 4, 2010. Plaintiff and its counsel have been arranging the logistics for these depositions and preparing for them over the past several weeks, with particular focus during the past few days. The preparation, travel and participation required for the depositions in Florida has made it impossible to complete the supplemental production directed by the Court within the time directed.

7. Plaintiff has asked for Defendants' consent to an extension of time for the supplemental production required of Plaintiff, to October 14, 2010. Defendants have responded with a qualified consent, indicating that Defendants will consent to a joint request for extension of time for both sides to comply with the Court's directives arising from the hearing of September 23, 2010, but with qualifications. Plaintiff seeks only an extension of time as expressed above, without the additional qualifications sought by Defendants. Under these circumstances, Plaintiff styles this motion as one with Defendants' partial consent.

Wherefore, Plaintiff respectfully requests an extension of time to October 14, 2010 to comply with the rulings issued as a result of the hearing of September 23, 2010.

/s/

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/s/

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*Attorneys for Plaintiff*

**Certificate of Service**

I certify that a copy of the foregoing documents was served on the date of ECF filing, via the ECF system, on all counsel of record.

/s/

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Stephen H. Ring